Christopher J. Carey Megan Halverson Trexler

GRAHAM CURTIN

A Professional Association 4 Headquarters Plaza; P.O. Box 1991 Morristown, New Jersey 07962-1991 (973) 292-1700 Attorneys for Defendants, Fischer, Porter & Thomas, P.C. and Arthur L. Porter, Jr., Esq.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

VICTOR MONDELLI,

:Civil Action No. 14-cv-6196 (KSH)(CLW)

Plaintiff,

٧.

BERKELEY HEIGHTS POLICE DEPARTMENT, MICHAEL P. MATHIS, Chief of Police of the Berkeley Heights Police Department, in his individual capacity, MICHAEL: DELIA, Detective at the Berkeley Heights Police : Department, in his individual capacity, JOHN DOES 1, Supervising Officer of Michael Delia, JOHN DOE 2, Berkeley Heights Police Officer, in: his individual capacity, THOMAS BOCKO, Zoning Officer of Berkeley Heights, in his individual capacity, JACK SILVERMAN REALTY & MORTGAGE CO., LLC, BERKELEY REALTY PARTNERS 244, LLC, JACK SILVERMAN, in his individual capacity, WILLIAM SILVERMAN, in his individual capacity, FISCHER, PORTER & THOMAS, P.C., : ARTHUR PORTER, JR., partner in Fischer, Porter: & Thomas, P.C., in his individual capacity, ROBERT DOWLING, in his individual capacity, : and JACK DOWLING, in his individual capacity, :

Defendants.

NOTICE OF CROSS-MOTION FOR SANCTIONS PURSUANT TO FED.R.CIV.P. 11(c)(2) Case 2:14-cv-06196-KSH-CLW Document 56 Filed 01/20/16 Page 2 of 2 PageID: 550

PLEASE TAKE NOTICE that Defendants, Fischer, Porter & Thomas, P.C. and Arthur

L. Porter, Jr., Esq., by their attorneys, Graham Curtin, A Professional Association, shall cross-

move on February 1, 2016, or as soon thereafter as counsel may be heard, before the Honorable

Katharine S. Hayden, U.S.D.J., in United States District Court for the District of New Jersey, for

an Order granting Defendants' motion for sanctions pursuant to Fed.R.Civ.P. 11(c)(2).

PLEASE TAKE FURTHER NOTICE that in support of this Cross-Motion, Defendants

shall rely upon the Declaration of Christopher J. Carey, Esq. and the memorandum of law

submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted

herewith.

GRAHAM CURTIN

A Professional Association Attorneys for Defendants,

Fischer, Porter & Thomas, P.C. and

Arthur L. Porter, Jr., Esq.

Dated: January 19, 2016

/s/ Christopher J. Carey

Christopher J. Carey